

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JONATHAN L. CODY, II,
Plaintiff

v.

MARC S. HOWELL, STEPHEN
MARTE, EVEN MCKENNA,
AUSTIN SNYDER, BRANDON
BRAUGHLER, and the CITY OF
HARRISBURG,
Defendants

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CIVIL ACTION - LAW

NO. 1:24-cv-00927JPW

PLAINTIFF'S RULE 26(a) DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Jonathan L. Cody, II, by and through his counsel, Roger R. Laguna, Jr., Esquire, provides the following disclosures:

A. The following individuals at the last known addresses are likely to have discoverable information that the Plaintiff may use to support her claim:

1. Plaintiff, Jonathan L. Cody, II, 130 Locust St., Apt. 8, Harrisburg, PA 17101.
2. The Defendant and each of the Officers and other individuals expressly referenced in Harrisburg Bureau of Police incident Report Form HC-22-002767, dated 02/06/2022.
3. The Harrisburg Bureau of Police.

Plaintiff reserves the right to supplement this list as discovery continues up and until the time of trial.

B. DISCLOSURES PURSUANT TO RULE 26(a)(1)(A)(ii)

1. Photo images of Plaintiff.
2. Video/audio recordings depicting the incident.
3. Medical Records re Plaintiff.

Plaintiffs reserve the right to supplement this list as discovery continues up and until the time of trial.

C. DISCLOSURES PURSUANT TO RULE 26(a)(1)(A)(iii)

Plaintiffs compute damages at ~ \$100,000.00, as follows:

1. Compensatory damages for assault and personal injury; pain and suffering and an undetermined amount for intentional deprivation of constitutional rights.
2. Punitive damages in an undetermined amount.
3. Attorneys fees as allowed by statute or other law. Attorneys fees are still accruing.

Plaintiffs reserve the right to supplement this list as discovery continues up and until the time of trial.

D. DISCLOSURES PURSUANT TO RULE 26(a)(1)(A)(iv)

Does not apply to the Plaintiff.

9-20-2024

/s/ Roger R. Laguna, Jr.
Roger R. Laguna, Jr., Esquire
Supreme Court I.D. No.: 75900
Attorney for Plaintiff

LAGUNA KREVSky ROSEN, PLLC
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BRAUGHLER, and the CITY OF	§	
HARRISBURG,	§	
Defendants	§	

CERTIFICATE OF SERVICE

I hereby certify that on this date, I served a true and correct copy of this filing via email to:

Murray J. Weed, Esquire
mweed@laverylaw.com

9-24-2024

/s/ Roger R. Laguna, Jr.

Roger R. Laguna, Jr., Esquire
Supreme Court I.D. No.: 75900
Attorney for Plaintiff